

**MELISSA PIASECKI, M.D.**  
**FORENSIC PSYCHIATRY**  
561 KEYSTONE AVE. #104  
RENO, NV 89503  
775 722-1077 FAX 866 500-7716  
piaseckimd@gmail.com  
BOARD CERTIFIED IN PSYCHIATRY AND FORENSIC PSYCHIATRY

## Report of Findings

January 28, 2020

**Re: Teri Dean**

Cause No. 5:19-cv-06022

### I. Qualifications

I am a Professor of Psychiatry at University of Nevada, Reno School of Medicine. I am currently certified by the American Board of Psychiatry and Neurology in General Psychiatry and Forensic Psychiatry.

I am a practicing forensic psychiatrist and hold an active medical license in two states. I am a consultant to the U.S. Department of Justice, Civil Rights Division. In this role, I have participated in investigations of correctional facilities, including a women's prison. A copy of my CV, which includes publications, and a four year Record of Testimony are attached.

### II. Sources of Information

To complete this report of findings, I interviewed Ms. Dean by phone on 1.23.20.

I also reviewed the following documents related to this case:

1. Complaint: Teri Dean vs. Edward Bearden, Elijah Mosier, Todd Mustain, Kevin Reed and Anne Precythe
2. Missouri Department of Corrections Medical Records 2013- 2019

### III. Findings

My findings are based on the above documents, my assessment of Ms. Dean,

my medical training, my experience as a psychiatrist and the published literature. My opinions are held to a reasonable degree of medical and scientific certainty.

1. Ms. Dean was incarcerated at the Chillicothe Correctional Institution in Missouri between June 2012 and October, 2018.
2. During the time she was incarcerated at the Chillicothe Correctional Institution, Ms. Dean was sexually harassed and sexually assaulted by Mr. Edward Bearden, who was a correctional officer at Chillicothe. The harassment and abuse by Mr. Bearden included:
  - a. Pat downs that were so rough and intrusive that Mr. Bearden put his hands and fingers into the labia of her vagina. He made harassing statements regarding her menstrual cycle when he detected a sanitary pad or a tampon.
  - b. Grabbing her breasts with such force that her breasts were later sore and bruised.
  - c. Shoving her into shelving, resulting in bruises, welts and red marks on her back, shoulder and back of her head.
  - d. Repeatedly digitally penetrating her vagina, resulting in swelling of her vaginal tissues and pain with walking and urination
  - e. Groping her upper legs during haircuts while his hands were hidden under a smock, resulting in injuries and scars on her hands when the groping led her to accidentally cut herself with scissors.
  - f. Timing his visits to her cell in order to watch her undress.
3. In addition to the physical injuries described above, the harassment and abuse by Mr. Bearden resulted in the following emotional injuries:
  - a. Disturbed sleep with difficulty falling asleep and recurrent nightmares about the abuse. Specifically, Ms. Dean has nightmares of the assaults that occurred and nightmares of assaults in which Mr. Bearden holds her down and rapes her. She also has nightmares of being gang raped by the correctional officers named in the complaint.
  - b. Ms. Dean described the frequency of nightmares as averaging every other night. She often wakes from the nightmares feeling disoriented and sweating, with difficulty breathing. She wakes up roommates when she cries out in her sleep.
  - c. Anxiety symptoms characterized by chest pain, shakiness, hyperventilation and an urge to flee. These symptoms are triggered by the sound of keys. Mr. Bearden wore cologne and anxiety symptoms are triggered by the smell of cologne.
  - d. New onset auditory hallucinations with the voice of Mr. Bearden.
  - e. Feelings of self-disgust and self-blame.
  - f. Thoughts of suicide and self-injurious behavior. Ms. Dean stopped eating for a period, with a wish to become ill and die.

4. During the time she was incarcerated at the Chillicothe Correctional Institution, Ms. Dean was sexually harassed and sexually assaulted by Mr. Elijah Mosier, who was a correctional officer at Chillicothe. The harassment and abuse by Mr. Mosier included:

- a. Shoving her against a table and wall, resulting in bruises, welts and red marks on her arms and shoulders.
- b. Repeatedly digitally penetrating her vagina, resulting in bleeding and swelling of her vaginal tissues and pain with walking and urination.

5. In addition to the physical injuries described above, the harassment and abuse by Mr. Mosier resulted in the following emotional injuries:

- a. Disturbed sleep with difficulty falling asleep and recurrent nightmares about the abuse. Specifically, Ms. Dean has nightmares of the assaults that occurred with Mr. Mosier and nightmares of sexual assaults in which Mr. Mosier rapes her. She also has nightmares of being gang raped by the correctional officers named in the complaint.
- b. Ms. Dean described the frequency of nightmares as averaging every other night. She often wakes from the nightmares feeling disoriented and sweating, with difficulty breathing. She wakes up roommates when she cries out in her sleep.
- c. Anxiety symptoms characterized by chest pain, shakiness, hyperventilation and an urge to flee. These symptoms are triggered by the sound of keys. Mr. Mosier wore cologne and anxiety symptoms are triggered by the smell of cologne.
- d. Thoughts of suicide and self-injurious behavior. Ms. Dean stopped eating for a period, with a wish to become ill and die.
- e. New onset auditory hallucinations with the voice of Mr. Mosier.
- f. Feelings of self-disgust and self-blame.

6. During the time she was incarcerated at the Chillicothe Correctional Institution, Ms. Dean was sexually harassed and sexually assaulted by Mr. Todd Mustain, who was a correctional officer at Chillicothe. The harassment and abuse by Mr. Mustain included:

- a. Shoving her into a corner of a utility closet against mops and yanking her bra in order to expose her breasts, resulting in welts and red marks.
- b. Watching her in the shower before the administrative segregation unit had shower curtains.
- c. Verbally harassing her with explicit and disturbing sexual comments.

7. In addition to the physical injuries described above, the harassment and abuse by Mr. Mustain resulted in the following emotional injuries:

- a. Disturbed sleep with difficulty falling asleep and recurrent nightmares about the abuse. Specifically, Ms. Dean has nightmares of the assaults that occurred with Mr. Mustain and nightmares in which Mr. Mustain rapes her. She also has nightmares of being gang raped by the correctional officers named in the complaint.
- b. Ms. Dean described the frequency of nightmares as averaging every other night. She often wakes from the nightmares feeling disoriented and sweating, with difficulty breathing. She wakes up roommates when she cries out in her sleep.
- c. Anxiety symptoms characterized by chest pain, shakiness, hyperventilation and an urge to flee. These symptoms are triggered by the sound of keys and by tall men.
- d. Hypervigilance, since Mr. Mustain worked in several areas of the prison and "could pop up anywhere."
- e. Thoughts of suicide and self-injurious behavior. Ms. Dean stopped eating for a period, with a wish to become ill and die.
- f. New onset auditory hallucinations with the voice of Mr. Mustain.
- g. Feelings of self-disgust and self-blame.
- h. Foregoing meals and showers in order to avoid verbal or visual contact with Mr. Mustain, out of fear of that he would sexually harass her when meal trays were passed out and that he would watch her shower.

8. During the time she was incarcerated at the Chillicothe Correctional Institution, Ms. Dean was sexually harassed and sexually assaulted by Mr. Kevin Reed, who was a correctional officer staffing the kitchen at Chillicothe. The harassment and abuse by Mr. Reed included:

- a. Physical assaults that left marks and bruises.
- b. Verbal harassment and threats of rape.

9. In addition to the physical injuries described above, the harassment and abuse by Mr. Reed resulted in the following emotional injuries:

- a. Disturbed sleep with difficulty falling asleep and recurrent nightmares about the abuse. Specifically, Ms. Dean has nightmares of the assaults that occurred and nightmares of sexual assaults in which Mr. Reed acted on his threats to "Bend you over the table and yank your khakis down." She also has nightmares of being gang raped by the correctional officers named in the complaint.
- b. Ms. Dean described the frequency of nightmares as averaging every other night. She often wakes from the nightmares feeling disoriented and sweating, with difficulty breathing. She wakes up roommates when she cries out in her sleep.

- c. Anxiety symptoms characterized by chest pain, shakiness, hyperventilation and an urge to flee.
- d. Feelings of nausea due to the disturbing and graphic threats he made to her.
- e. Thoughts of suicide and self-injurious behavior. Ms. Dean stopped eating for a period, with a wish to become ill and die.
- f. New onset auditory hallucinations with the voice of Mr. Reed.
- g. Feelings of self-disgust and self-blame.

10. As an inmate in a correctional facility, Ms. Dean had no means to avoid or escape the abusers. She noted that the correctional officers could “call her to the back” at any time and Mr. Mosier, as a Sargent, could “take you anywhere.”

11. Ms. Dean was threatened with and experienced the consequence of solitary confinement (“administrative segregation”) if she disclosed the assaults. When in confinement, she was unable to have contact with family visitors. She was placed in a “turtle suit” without clothing or underwear for up to three days at time.

12. Ms. Dean experienced the consequence of losing her belongings and having personal photos damaged by coffee or water. The loss of her belongings increased her fear of the correctional officers as she feared “what else they may be capable of.”

13. Ms. Dean kept notes about the abuse in journals and calendars. These items were destroyed by the correctional officers.

14. Ms. Dean suffered personal losses among family members. Following these losses, she experienced grief. She observed that the assaults from the correctional officers increased during this period. She noted that they “swooped in” after her son died. When she was observed crying, one of the abusive officers called her into the back where she was assaulted. The four correctional officers laughed about her and gave the impression that they were making bets.

15. Ms. Dean has experienced disabling symptoms of Post-traumatic Stress Disorder (PTSD). This is a psychiatric disorder that follows a traumatic experience or event. The sexual assaults at the Chillicothe Correctional Institution occurred repeatedly and constituted a broad and extended series of traumas.

16. Ms. Dean experiences symptoms of PTSD that are directly related to the sexual assaults when she was in custody at the Chillicothe Correctional Institution. The categories of PTSD symptoms include:

- a. Intrusive and distressing recall of the assaults in the form of nightmares and intrusive memories.
- b. Anxiety and physiological reactions that are triggered by reminders of the abuse.
- c. Negative thoughts and emotions about herself and others
- d. Psychological over-activation such as hypervigilance, irritability and poor sleep.
- e. Avoidance of activities, places and situations related to the abuse, to avoid activation of anxiety and physiological symptoms.

17. As a result of PTSD symptoms, Ms. Dean has experienced clinically significant distress and a decreased ability to function. Her symptoms of PTSD and decreased functioning include:

- a. Her sleep is disrupted, of decreased duration and she regularly experiences nightmares that awaken her.
- b. She no longer participates in sports or runs on the track in order to avoid correctional officers looking at her. She has recurrent thoughts of Mr. Mosier making comments about her breasts when he watched her run on the track.
- c. Her capacity to function socially is impaired. She isolates on her bunk and has few friends. She is reluctant to interact with peers.
- d. She experiences feelings of doubt and self-blame regarding her role in the abuse.
- e. Her ability to contemplate a future is impaired. She sees her future self as "paranoid, skeptical and mistrusting." She can no longer be optimistic about her future.
- f. She experiences high levels of anxiety, panic, racing thoughts, anger, mood swings, depression, memory impairment and anhedonia.

18. Prior to the abuse at the Chillicothe Correctional Institution, she did not experience disorienting nightmares, panic symptoms, bipolar disorder, hallucinations, suicidal thoughts or Crohn's disease.

19. Following the abuse at the Chillicothe Correctional Institution, Ms. Dean has been treated for trauma-related nightmares with the medication Prazosin. While incarcerated, she has been treated with an antipsychotic medications (Geodon, Risperdal) for auditory hallucinations and paranoia, antidepressants (Effexor, Cymbalta, Celexa, Remeron, Zoloft,) for depression and anxiety and mood stabilizing medication (Lamictal, Trileptal). Her symptoms have not remitted with treatment.

20. Ms. Dean required emergency surgery for Crohn's disease. Her disease progressed as a result of her reluctance to seek medical help at Chillicothe Correctional Institution. Her reluctance was based on the relationships between the medical staff and the correctional officers who

were abusing her.

21. Ms. Dean will require ongoing individual psychotherapy for at least ten years and for the foreseeable future.

22. Ms. Dean will require ongoing individual psychiatric care for medication management for the foreseeable future.

IV. Statement of Compensation

SLU and I have an agreement for a discounted hourly rate of \$250/hour. Compensation for my professional services related to this report is capped at \$6,000.

Please contact me if you have any questions about this report.

Sincerely,

A handwritten signature in dark ink, appearing to be 'M. Piasecki', with a stylized, flowing script.

Melissa Piasecki, M.D.